

1 until this enhancement to their billing systems is done.

2 First, the incumbents must develop terminating
3 access factors. These factors are needed to allocate
4 determining access coming into the unbundled switch to
5 determine what of that terminating access or how much of
6 that terminating access the CLECs that are using that switch
7 are entitled to. I think it's important to note that
8 there's a history in the industry of using terminating
9 originating factors dating back to divestiture, when pre-equal
10 access, the local companies could not bill terminating
11 access at all. The capability was not there. They derived
12 the terminating access from the originating usage, based on
13 T to O ratios, until such time as the switches were enhanced
14 to measure that terminating usage.

15 Secondly, the incumbents must provide new entrants
16 with carrier specific access usage information in a timely
17 manner, so not only do we know how many terminating access
18 minutes are we entitled to, we would know which of the IXC's
19 operating in that area to bill those access minutes to, we,
20 the CLECs.

21 Again, appropriate hour assessed enhancements must
22 be made, both to provide the short term solutions to allow
23 us to move forward with purchase of the unbundled switch and
24 get all the data that we need, and enhancements must refer
25 them to allow for the long term solution to actually cull

1 out the line by line usage that is recorded in the switch
2 and could be provided to the end user. Thank you very much.

3 MR. WELCH: Thank you.

4 Finally, we'll hear from Dennis Perkins from
5 Brooks Fiber. Dennis?

6 MR. PERKINS: The message I bring today is on the
7 need for billing standards and interface standards. The
8 telecommunication industry requires a significant amount of
9 billing data to be passed between telephone companies. This
10 data needs to be passed quickly and in a standard electronic
11 format. As we work to establish our billing processes and
12 the required data exchanges with the various RBOCs, it has
13 highlighted the need for a fresh look at the current
14 processes and standardization.

15 Many standards do exist today, while many others
16 need to be addressed. A standardization of interfaces needs
17 to includes processes, data formats and required data
18 elements that are necessary to insure accurate and timely
19 billing information.

20 As a new entrant in providing local exchange
21 services, Brooks must set up interfaces with the RBOCs.
22 Setting up the various required interfaces with one RBOC is
23 difficult, and this is multiplied when dealing with multiple
24 RBOCs. Brooks has had to work the same type issues with
25 each RBOC on a one item at a time basis. In turn, this

1 makes the process more costly, as well as time consuming.

2 In addition, each new entrant is faced with
3 conforming to the existing RBOC systems in each region. In
4 working with each RBOC, we hear statements like, this is how
5 we do it in our region. In setting up our operations, we
6 are required to conform to the unique and different
7 practices in each region. This places a burden on the new
8 entrant to expend resources and conform to each region.

9 Some of the interfaces have not been previously
10 done, and many interfaces and processes are being developed
11 as they are encountered. In the absence of standards, these
12 processes take on an individual life of their own.

13 I have several examples that illustrate billing
14 interface differences that we have encountered. My purpose
15 in reviewing these is to highlight the need for performance
16 and interface standards. For instance, when it is necessary
17 to exchange clearing house records with Southwestern Bell,
18 we must exchange records in EMR format as category 92
19 records. With Bell South, we use a different EMR format.

20 Another area that has different interface
21 requirements is IntraLATA toll access. For example, in New
22 Mexico and Arizona, we must set up an interface with the
23 originating responsibility plan to receive compensation for
24 IntraLATA toll access. Other areas do not have an ORP
25 process, and require different interphases.

1 The next example deals with local access record
2 exchange. There are not standards in the industry for
3 format, data substantiation requirements or billing formats.
4 In working with each RBOC, we are establishing the process
5 and reporting requirements to bill each other for local
6 access. A lack of standardization will lead to many
7 disputes in this area.

8 In the area of carrier access billing, some of the
9 general requirements are the same between RBOCs, but each
10 has a separate and different process.

11 Another interface is billing and information for
12 unbundled network elements. There is a need for
13 standardization and providing of electronic data. These
14 invoices are sometimes created electronic format and
15 sometimes paper format. In many cases, the RBOCs have not
16 yet identified how the information will be made available,
17 for billing of certain network elements and electronic bill
18 providing in a CABS format and other bills are sent in a
19 paper format.

20 At U.S. West, they will supply a paper bill or an
21 EDI version, but in a CRIS format. Like I said, others to
22 be determined.

23 The last example I want to mention has to do with
24 an electronic data exchange request with Ameritech. For
25 alternatively billed calls to reported numbers, Ameritech

1 only supplies this information to Brooks on a paper bill.
2 An electronic version of this information is not available.
3 By only receiving the message detail on paper, Brooks does
4 not have an electronic means to bill the end user. Without
5 the electronic information, Brooks incurs expenses from
6 Ameritech and sustains lost revenues from the lack of Brooks
7 being able to bill these calls to its end user.

8 In summary, these interfaces can be complex and
9 they are made more complex by having multiple processes to
10 accomplish the same task. The point that I want to make is
11 that without performance and interface standardization,
12 including processes, data formats, data requirements, an
13 entry of competition will be slower and more expensive.
14 Thanks.

15 MR. WELCH: Thank you. Now we'll move to the
16 question and answer session, and I'm going to turn to Kalpak
17 Gude to take the lead in asking the questions.

18 MR. GUDE: First, I want to direct the opening
19 question to Beth. What processes are being or should be
20 used to transmit billing information to competitors? I
21 think you mentioned that briefly in your opening. Also,
22 could you talk a little bit about whether these systems are
23 fully tested and to some extent, how they were tested?

24 MS. LAWSON: With regard to the billing
25 information for resale, with our CRIS Resale 811, this has

1 been in existence for a number of years, and we have live
2 customers receiving over 30,000 accounts currently today.
3 So, we are in a live mode with this. This was something
4 that we used in our retail business operations and the type
5 of billing information for resale is the same products and
6 services that we would sell in our retail operations. So,
7 as far as resale, that was already in existence.

8 With regard to Unbundled Network Elements, that
9 was introduced as a feature group, you and our CABS billing
10 system, so we utilized a local CABS bill data tape, which is
11 similar to what they do in the access world, except it would
12 be an access bill data tape. So, it's the same type of
13 electronic format with a current CABS version that's been
14 implemented.

15 With regard to Bill Plus, that is a PC diskette
16 and that is a proprietary system that we actually customize
17 programming ourselves, so that we can provide the data so
18 you wouldn't have to do any programming yourself, and
19 provide standardized reports, but you can also do ad hoc
20 reports if you would like.

21 With regard to the usage extract, which is the new
22 area that's been added, that is in standard EMR industry
23 format that's been agreed to by OBF.

24 MR. WELCH: From Mary, could we hear the response
25 to that?

1 MS. BERUBE: Sure. Currently, we are providing on
2 the resale side billing out of our CRIS system. For, as I
3 mentioned earlier, for two of our customers, we're providing
4 electronic via an NDM protocol, electronic transmission of
5 billing detail data that more fully or finer point of
6 granularity of the billing detail that's on the paper bill.

7 For the remaining, it's paper bill. We are
8 currently evaluating electronic means, however, we have not
9 had specific requests from other CLECs at this point for
10 electronic means, so our intention is to do our internal
11 evaluation, and then propose to our CLECs some of the ideas
12 that we've come up with.

13 In terms of Unbundled Network Elements, it is our
14 intention to provide those through CABS, so for those
15 carriers with whom we have existing NDM transmissions for
16 CABS billing data, that will continue. For others, we will
17 need to have those discussions when they order those
18 services from us on the transmission means that they intend
19 to use.

20 Daily usage feed is an NDM feed again in EMR
21 standard format, for those customers who are presently
22 availing themselves of that offering.

23 MR. WELCH: Dennis earlier mentioned in his
24 opening the problems with developing different systems to
25 deal with different incumbents.

1 As national standards are developed in the billing
2 area, do you have plans to move towards the implementation
3 of national standards?

4 MS. BERUBE: I think it depends, in fact, what the
5 national standards are and the services that are supported
6 by those national standards. Certainly in the Unbundled
7 Network Element area, those have been discussed at the OBF,
8 data elements have been identified and the formats that are
9 currently in place seem to fit those needs.

10 In terms of resale, there is definitely a
11 divergence of opinion by the industry where and how to best
12 bill, out of what systems and how to best bill for those
13 services. While, in the OBF, there are guidelines which
14 have developed that identify the data elements, the systems
15 that provide that information have been in question and we
16 will continue to evaluate, based on our capability and our
17 assessment of our customers' needs, the appropriate systems
18 from which to bill those services.

19 MS. LAWSON: Can I -- oh, what I was going to say
20 was respond as far as with resale, the EDI that's being
21 proposed in the ordering world as an industry standard, the
22 811 transactions that have been out there, it's been
23 utilized, it is an industry standard. So, from Southwestern
24 Bell's perspective, there is a standard that is available
25 and can be utilized by any ILEC that -- and a lot of them do

1 go ahead and offer CRIS resale to their business customers,
2 and they can make that option available, as well, to the
3 CLECs. That way, the CLECs would be able to receive an
4 industry standard, same format, for any type of billing.

5 With regard to usage, that has been pretty well
6 defined, that OBF with the EMR, and the unbundling, I think
7 that's being further defined as they get into some of the
8 component pieces, as the local switching and other unbundled
9 elements get a little better definition.

10 MR. GUDE: Bob?

11 MR. FALCONE: Yes, Kalpak, thank you. I agree
12 with my fellow panelists with respect to resale. There are
13 interfaces established today.

14 However, one of the problems, unless those
15 interfaces are enhanced, if they're using their current
16 retail model, there is a restriction on how many accounts
17 you could put on the same billing account or how many lines
18 you could put on the same billing account. So, what we're
19 finding ourselves in, often, is a situation in resale of
20 having multiple billing accounts to get our bills, because
21 there's a max. So, I think there's some enhancement work
22 that needs to be done to the retail biller to expand that,
23 so we get one bill for our usage.

24 With respect to unbundled elements, I also agree
25 that CABS is the method of choice for us to receive our bill

1 for the elements and I think we only heard of one half of
2 that unbundled element equation, though, and that's the bill
3 to us for the use of the element. Where I think there's the
4 major void is, as I mentioned in my opening remarks, is how
5 do we get all the usage that we need from the unbundled
6 elements, so that we can turn around and generate the bills
7 that we have to generate as a CLEC operating in that area,
8 specifically access, reciprocal compensation and user
9 billing? I think that's a major void right now.

10 MS. LAWSON: I would agree with what my panelist
11 also said, as far as a void. Southwestern Bell has
12 discussed looking at putting new, deploying new software in
13 their switches that will provide the type of information
14 that is being discussed. It's just a matter of timing to
15 get funding for that software and then getting it deployed
16 in the switch and identifying how the unbundled local
17 switching product would be defined. I agree with moving
18 there.

19 And, with regard to the other comment, as far as
20 number of bills, AT&T didn't mention Southwestern Bell, but
21 I know that was very near and dear, based on some previous
22 discussions we've had. We do agree that we need to look at
23 the number of bills that we are issuing, because in a retail
24 world, you do issue them to end users. When you get into a
25 wholesale world, you need to look at summarizing those up

1 and offering fewer number of bills. We have agreed to look
2 at what type of options, depending on the type of data that
3 CLECs would be willing to receive.

4 In other words, you could get your bill at one
5 point and get the subsequent billing data at a different
6 point, so that it could be aggregated, so that your bill
7 would be at one time during the month, but your billing data
8 could be spread out throughout the month, so you could get
9 it that way.

10 MS. BERUBE: I think from our perspective, we are
11 also looking to add more flexibility to our current systems.
12 As I mentioned earlier, there are many systems involved in
13 billing. They're large, they're complex, they've been
14 developed over a long period of time.

15 If we had the resources and the opportunity and
16 could make it happen tomorrow, possibly we would replace
17 everything we have with something better and greater.
18 However, that's not the case, and especially for a company
19 of our size. We certainly cannot afford to do so. So, we
20 are continuing to look at building flexibility into the
21 systems that will accommodate the new customer environment,
22 and working with the customers on short term and long term
23 solutions to get there.

24 MR. FALCONE: I was simply going to say that I
25 purposely didn't implicate Southwest Bell, because if you

1 believe the newspaper articles that you're reading, I may be
2 working for them soon.

3 (Laughter.)

4 MR. WELCH: I was going to comment on the last
5 panel and I bit my tongue, but somehow, inadvertently, we
6 had the Southwestern Bell and the AT&T people in the last
7 panel sitting side by side and I wanted everybody to know
8 that was completely inadvertent.

9 (Laughter.)

10 MR. GUDE: This one is directed towards you,
11 Dennis. There's been a lot of talk about standardization in
12 formats. What are the formats or standards you see industry
13 moving towards or will continue to have, or will we continue
14 to have multiple formats in the future?

15 MR. PERKINS: Well, I hope we don't have multiple
16 formats. There are a lot of standard out there today that
17 exist. I mean, we've had mention of EMR formats, and I
18 think that's a fairly standard format. But, the application
19 of some of those standard formats are different between
20 companies, which makes it difficult to program the different
21 nuances of those into an existing system, when you're trying
22 to do a national application.

23 So, I believe there are formats out there that we
24 can use. There are also systems that we can use to transmit
25 data back and forth. We have NDM systems set up and CMDS

1 systems set up to transmit data throughout the country,
2 between the different telephone companies. So, I see that
3 there are things out there, in the exchange of records,
4 messages for telephone billing, but there are some other
5 issues that have been mentioned with the unbundled loop
6 elements, and those that haven't been.

7 There are also areas of just this week, I was
8 asked by Southwestern Bell to provide two official company
9 numbers, one for resell, one for our facility based
10 operations. And, by having two in each state that we do
11 business, that will make it confusing, as to which one
12 people should use to put the operations and the transactions
13 for Brooks, and to identify those.

14 So, we're trying to develop systems around
15 existing legacy systems that will cause problems when we
16 exchange data.

17 MS. BERUBE: If I could, I'd like make a comment
18 on that. Dennis, I agree with you that across the country,
19 different companies have implemented the billing
20 functionality somewhat differently.

21 I think, however, that is going to be the nature
22 of the beast on the going forward basis. Although the names
23 of the products and services that we will offer to CLECs
24 might be the same, the terms and conditions under which
25 they're offered and the specific tariff requirements may be

1 different, and that oftentimes drives the billing.

2 So, to the extent that there might be a different
3 term and condition or different pricing arrangements for
4 certain services, the billing for those will be different
5 from company to company, and I'm not sure how that can be
6 avoided, quite honestly.

7 MS. LAWSON: I might add to that, I know you
8 mentioned earlier about the clearinghouse, some of those
9 relationships like were mentioned with tariffs, also impact
10 the independent companies that you're operating with and
11 sharing records, so some of those types of relationships
12 drive what type of record types get provided in the
13 clearinghouses between the BOCs and the independents, so
14 those can also impact.

15 MR. GUDE: This is a question for Bob. In
16 situations where the incumbent does not have sufficient
17 billing information for exchange access, how do you propose
18 to bill or how do you propose that they bill for exchange
19 access when purchasing the unbundled local switching
20 element? I think what I'm looking for is sort of a further
21 explanation of the factor based approach that you mentioned
22 earlier, and I would like the other panelists to comment on
23 that approach, as well.

24 MR. FALCONE: Before I go into the detail, which I
25 certainly will, I want to stress that I believe the factor

1 approach is an interim approach, subject to true up. So,
2 the one thing that's important to note is that all the
3 information is available. It's just that the billing
4 systems that the incumbents have today never were required
5 to cull out on a line by line basis which terminating access
6 went to which line. It was just terminating access from an
7 IXC and it got billed en masse. Now, there's a need to do
8 that, and further downstream, the long term solution is to
9 have further downstream systems, sort of do that line by
10 line comparison and get the usage into the right pie.

11 Until that happens, my proposal is the use of a
12 terminating to originating ratio and how that would work is,
13 you would, the incumbent elect knows that an end office
14 level, the IXC, in aggregate, T to O ratio, is, they know
15 the total originating usage for all IXCs on that end office.
16 They know all the terminating usage and based on that, they
17 can develop a ratio of whatever that is. That ratio would
18 probably go out to five decimal places. You know, it might
19 be .98763, but let's just say for argument's sake, it's .99,
20 just to make it easy.

21 So, that .99 means that for every hundred
22 originating IXC calls in that end office, there is 99
23 terminating. So, now what would happen is, my total
24 originating usage, me, as a CLEC, that 99 would be applied
25 to my total originating access usage, and that's how we'd

1 derive my total, a bucket of what I'm entitled to bill for
2 terminating, cause under the assumption that my end users in
3 that end office are mirroring the profile of that end
4 office.

5 So, if I originated 1,000 IXC minutes, my
6 customers originated 1,000 IXC minutes, I would be able to
7 bill terminating usage for 99 percent of that thousand.
8 Then, how you would allocate that 99 percent amongst all the
9 IXCs, because now I know how many minutes I'm entitled to,
10 now I have to know who to bill them to, it would be a simple
11 ratio of all the IXCs that operate on that switch, let's say
12 there's five, what percent of their terminating traffic?

13 So, if AT&T as an IXC terminates 50 percent of the
14 traffic into that switch, I'm entitled to bill AT&T 50
15 percent of my bucket of terminating minutes, and if MCI was
16 30 percent, I'm entitled to bill MCI 30 percent and so on,
17 so it would kind of be two ratios, one the T to O and then
18 one based on the percent of IXCs operating in that switch
19 for terminating traffic.

20 MS. LAWSON: Southwestern Bell's current policy is
21 that on resale lines, that the access is Southwestern Bell's
22 revenue, so they therefore did not see a need to provide
23 access records to the CLECs, because they have no need to
24 receive them, since the revenue is Southwestern Bell's.
25 However, if that policy does change and if we did lose it in

1 arbitration, we had talked about the factoring. The
2 situation that you get in with doing factors in the access
3 world, when this was done is, you get billing disputes,
4 because it's not actual information.

5 So, I'm developing a factor based on something
6 that I think happened, but it's not an actual occurrence.
7 So, when you develop factors, you do set yourself up that
8 it's not what actually happened and there can be, oh, I
9 really don't think I had 50 percent or I don't think I had
10 80 percent, are you sure your switch recorded it?

11 So, we would prefer, if we did look at giving
12 access records at some point in the future, to have that
13 available coming off the switch, to identify which CLECs'
14 record that was, so that we wouldn't get into a factoring
15 position.

16 MR. GUDE: Just one follow up. That was your
17 position on resale, but what about the unbundled switch from
18 the unbundled platform?

19 MS. LAWSON: It is the same, too.

20 MR. GUDE: That it is SBC's position that SBC
21 holds the --

22 MS. LAWSON: The access revenue, correct.

23 MR. GUDE: SNET's position?

24 MS. BERUBE: On resale, we agree with SBC. In
25 terms of switching at this point, we don't have our full

1 policy established. We don't have unbundled switching yet
2 available. That is going to happen in third, fourth quarter
3 this year, so we will roll out the whole product and at that
4 point, make those decisions.

5 MR. GUDE: Bob?

6 MR. FALCONE: With respect to Beth's concern
7 regarding, first of all, to her first concern, I don't agree
8 with her at all on policy, but we won't even get into that.

9 MS. LAWSON: We don't have to discuss that, right?

10 (Laughter.)

11 MR. FALCONE: Right, we won't go to that movie
12 here. With respect to the second issue, I agree. As I
13 said, there is a history here, and that history was kind of
14 ugly. Factors do lead to billing disputes, no argument
15 there.

16 I think it's real important to stress this factor
17 proposal is a short term, interim solution, because the data
18 that's needed to give us the actual usage is there. It's
19 just like, it's there, but you don't know how to extract it,
20 and the proposal is that as soon as you develop the
21 downstream system to extract that data, you go back and do
22 it even on those records that we had factors, that we used
23 factors for, and we true up those bills based on actual
24 usage.

25 So, Bell Atlantic, for example, has said to us

1 that they are developing this extraction means and they will
2 have it available by August. So, that's great, and perhaps
3 we won't even be in business with unbundled switching in
4 Bell Atlantic territory until then, so we won't have to use
5 these factors with Bell Atlantic.

6 But, to the extent that some other company can't
7 develop what Bell Atlantic has developed in time for us to
8 use the unbundled switch, all I'm proposing is these factors
9 be used until such time as they do.

10 MS. BERUBE: One thing that I may add to the
11 extent that companies do not currently have available to
12 them this data, and have to go to large expense to implement
13 the recording capability for that data, we have a cost
14 recovery issue, as well, and that obviously remains to be
15 determined as to what that mechanism will be, but I would
16 propose that those costs need to be recovered.

17 MR. GUDE: Dennis?

18 MR. PERKINS: On our access recordings, what we've
19 been doing is working with a switch vendor to work a way to
20 record those minutes that are switched, the terminating
21 minutes. In certain cases where they're not, we're
22 exchanging originating minute information with the local
23 ILEC to, for looking at the access billings.

24 But, we are working with the switch vendors to
25 look at, can we record those terminating minutes.

1 MR. GUDE: Bob?

2 MR. FALCONE: To Mary's concern, the industry
3 standard for recording terminating access in the switch
4 requires that you record the originating number, the
5 terminating number, the carrier ID, so, again, the point is,
6 the information is there. As long as Southern New England
7 Telephone or any incumbent LEC is following the industry
8 standard for recording terminating access records, the
9 information is there. The incumbent LEC never needed all
10 that information to bill the IXC's, the access, because it
11 was billed in aggregate, but now they do need it, so that
12 they could separate out what piece of that a CLEC is
13 entitled to, as opposed to they're entitled to. That's
14 where there may be some cost recovery, is whatever needs to
15 be developed to separate that out.

16 MR. GUDE: To Dennis, could you explain how
17 originating and terminating access is billed when you
18 purchase an unbundled loop and number portability?

19 MR. PERKINS: That has had several disputes around
20 developing formulas to capture those minutes with the
21 interim number of portability. We have worked with
22 historical data, looking at the originating and terminating
23 minutes, and used that as a factor, and tried to identify
24 the minutes that are particularly associated with the
25 interim number of portability type calls, and used that, in

1 certain cases.

2 In certain cases, we're still under negotiations
3 on those terms, so we haven't come to a resolution on how to
4 identify that access. But, we talked about in certain cases
5 using our data or historical data to identify the types of
6 calls that are coming through the switches.

7 MR. GUDE: Would anybody else like to comment?

8 MS. LAWSON: With our unbundled local switching
9 right now our billing or our pricing is based on originating
10 minutes, it is not based on terminating minutes, at all.
11 Because as I mentioned earlier, we're looking at new
12 software that will be deployed in the switch, so right now,
13 the billing is based on originating minutes only for local
14 switching.

15 MS. BERUBE: Specific to number portability in our
16 tariff, we use what SNET has for the past year measured for
17 an average access minute, and we use that factor and that's
18 specified in our tariffs.

19 MR. GUDE: I think at this time we could open it
20 up to questions from the audience.

21 MR. WELCH: Please state your name and who you're
22 with and direct your question.

23 MR. MARLIN: Dave Marlin, LCI. Although I'd love
24 to get into access charges, we haven't got enough time in
25 the world. Directing it towards daily usage files and,

1 well, specifically, daily usage files, right now, with
2 probably the worst delivery we get is, I think 15 percent of
3 the calls in any one daily usage file are three days late,
4 another 30 percent is four days late, another 20 percent is
5 five days late, etc.

6 We probably don't get the usage for any one date
7 until about seven days after that particular cut off. Let's
8 say our billing cut offs the end of the month. We have to
9 wait seven days to get 90 percent of the data from a BOC for
10 that day, so we can start billing. We aren't dealing with
11 you right now, but I wonder, what are your service levels
12 for delivering daily usage to the CLECs?

13 MS. BERUBE: I don't have exact figures, but our
14 standard is 95 percent within 24 hours.

15 MS. LAWSON: What our price currently is is
16 whatever comes into our CRIS billing system, or it would be
17 our CABS billing system in the, for Unbundled Network
18 Elements. When that usage is brought into that night's
19 cycle, it is passed to the usage extract feed and that is
20 available in that nightly usage excerpt feed that is
21 available between midnight and 1 a.m.

22 So, as soon as our billing system has it, your
23 usage extract feed has it, just past that. Now, the only
24 reason there would be a delay is if we were receiving it,
25 like an in-collect from someone else or an alternatively

1 billed call. But, we wouldn't have it in our billing
2 system, as well, either. So, as soon as our billing system
3 gets it, it goes in that nightly feed.

4 MS. BERUBE: Right, since these systems are
5 basically processed in a batch load to the extent that a
6 call was made, just about the time that the recordings were
7 dumped off to the usage feeds, you wouldn't see that the
8 next day, but generally, when we have -- same thing with
9 Southwest Bell, when we have it, you get it.

10 MR. MARLIN: Okay, and in terms of the monthly --
11 you do send CABS and CRIS files monthly?

12 MS. LAWSON: The usage, right.

13 MR. MARLIN: When do those get to the CLECs?

14 MS. LAWSON: It's between the midnight and the 1
15 a.m., the usage extract feed for any usage that's billed on
16 the CABS bill or the CRIS bill will be included in the daily
17 feeds.

18 MR. MARLIN: Our experience has been with other
19 RBOCs that it's been a long time, and we -- there's nothing
20 that angers a customer more than getting service charges and
21 call charges two months later.

22 MS. BERUBE: And, on usage, I would agree with you
23 100 percent, which is why we recommend daily usage feed, so
24 that data is timely. To the extent that some CLECs don't
25 have the capability to process that information, that's

1 another issue.

2 However, with non-recurring charges and monthly
3 charges, as I mentioned earlier, the CLEC is in control of
4 the services that it provides to its end users and knows
5 what it needs to charge for those services. There need be
6 no reliance on the monthly bill that the ILEC sends for the
7 services. The CLEC purchases from the ILEC, in order to do
8 end user billing for those services.

9 MR. MARLIN: Let me understand, then. Then, you
10 mean the CLEC has all of the USOC charges and other service
11 charges that you would provide for the CLEC?

12 MS. BERUBE: No, I'm sorry, I mean that the CLEC
13 is the one who is actually providing the services to the
14 customer, and I'm assuming the CLEC has filed tariffs in its
15 appropriate territories that define what those services are.
16 The CLEC can therefore bill the end user for those services,
17 because it knows what it's providing to its customer, and
18 that is really independent of the services that the CLEC
19 purchases from the ILEC.

20 MR. MARLIN: But, the CLEC normally purchases
21 customer premise service from you and then resells to the
22 customer?

23 MS. BERUBE: You have tariffs, however, that
24 specify what those rates are for your customer and the
25 charges that you supply to them, so while there is a

1 reconciliation that the CLEC might want to do between the
2 charges that it receives from the ILEC and what it's billed
3 its end user, certainly the CLEC has the capability to bill
4 the end user based on the services that you provide and the
5 tariffs that you file.

6 MR. MARLIN: But, when do I find out how long
7 you've been at the customer premise?

8 MS. BERUBE: Excuse me?

9 MR. MARLIN: When do I find out as a CLEC how
10 long, how many hours, you've been on the customer premise
11 site for a non-recurring charge?

12 MS. BERUBE: Again, that depends on tariffs. If
13 there are hourly rates or if there are flat rates, there
14 might be some need there. I know in Connecticut, our
15 tariffs are flat rates.

16 MR. MARLIN: Okay, you're flat rating.

17 MR. GUDE: I think we need to move on to the next
18 question. Are there any other questions in the audience?

19 MR. BLAINE: Thank you, I'm Larry Blaine, staff
20 economist, Nevada PSC. We're having a, I think, somewhat
21 unique circumstance in Nevada, where Nevada Bell relies on
22 Pacific Bell for billing and other OSS functions.
23 Obviously, this creates a potential jurisdictional problem
24 for us in that a CLEC, a Nevada CLEC, may find itself in the
25 situation where it has to negotiate with Pacific Bell for